



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94105

CERTIFIED MAIL NO. # P 841 502 269  
RETURN RECEIPT REQUESTED

22 SEP 1988

In Reply  
Refer to: T-4-1

C.D. Van Gordon  
President  
L.A. by-Products Co.  
1810 E. 25th St.  
Los Angeles, CA 90058

Dear Mr. Van Gordon:

The United States Environmental Protection Agency (EPA) and the Los Angeles Department of Water and Power are conducting an investigation of ground-water contamination in the San Fernando Valley to determine the nature, cause and extent of contamination in the ground-water basin. The investigation will also assess the effects of the contamination on the environment and public health.

Part of this investigation will include identifying sources of contamination within the ground-water basin. EPA has reason to believe that your company may be in possession of needed information. Under the provisions of Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. 9604, and Section 3007 of the Resource Conservation and Recovery Act, as amended by the Solid Waste Disposal Act Amendments of 1980 (RCRA), 42 U.S.C. 6927, the Administrator of the Environmental Protection Agency has the authority to require any person who generates or has generated or otherwise handled hazardous wastes and/or hazardous substances to furnish information regarding its operations. The words "hazardous substances," "hazardous waste," and "person" are defined in 42 U.S.C. Section 9601 (14) of CERCLA, and the questions below. Pursuant to these statutory provisions, you are hereby requested to provide the following information for the landfill located at 8251 Tujunga Avenue in Sun Valley, California, and any other location in the San Fernando Valley:

1. A description of the purpose and operations of your facility including, but not limited to, a detailed description of any hazardous waste storage, treatment, or disposal operations. Include the dates of operation.
2. Please provide us with the following information regarding any municipal trash or other non-manifested materials which were taken to your landfill during its operation:
  - (a) The name of the city, refuse collection service, company or individual who generated or brought the material to the landfill (if a collection service brought material to the landfill on behalf of a city, please provide the names of both entities, and indicate their relationship);
  - (b) The volume or amount of the material;
  - (c) The amount billed and/or paid for the disposal of each material at the landfill;
  - (d) The period of time during which each entity disposed of such material at the landfill and the frequency of disposals (e.g., weekly, ten-times per day, etc.); and
3. Any photographs, maps, diagrams regardless of their date, which show areas where hazardous substances or hazardous wastes have been or may be located.
4. A description of past and present disposal practices of hazardous substances and hazardous wastes at your facility.
5. Locations and detailed descriptions of all monitoring wells, supply wells, injection wells, and underground tanks at your facility.
6. All analyses from sampling of monitoring and supply wells, underground tanks, soil samples, and soil-gas sampling conducted at your facility. Please include any reports written by consultant(s) about these sample analyses.
7. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, geohydrology, or air quality on or about the site? If so, please describe the planned investigation(s).
8. A list of all current and former employees, agents, contractors, consultants, company officers, and other personnel who may possess knowledge or information relevant to this inquiry. This list should include each individual's name, address, telephone number, and job title or function.
9. Length of time your company has been at the site location and any information you have regarding former occupants of this location and their hazardous waste practices.

10. Any information regarding use and disposal of chlorinated solvents by any person or business in the San Fernando Valley.
11. A descriptive list of all insurance policies held by your company. The description should include the dates during which each policy was in force, the general type of policy (e.g., comprehensive, general liability, automobile), the insurance company issuing the policy, the policy number, and any specific provision of the policy which may relate to claims for environmental damages.
12. A detailed description of all hazardous substance and hazardous waste spills, leaks, and incidents, as well as any clean-up actions undertaken during the history of your facility's operation.
13. An audited set of financial statements which includes a Statement of Financial Position/Balance Sheet, Income Statement, and Statement of Changes in Working Capital, and any other supplementary information for your company's most recent fiscal year.
14. Are you owned by another corporate entity as a subsidiary, division, or otherwise? If so, list owner(s).

Please answer each question separately. Documents supplied should be labeled with the number of the question that the documents address.

Your response to this request for information must be sent to EPA within thirty (30) calendar days of your receipt of this letter and should be directed to:

Alisa Greene and/or Patti Cleary  
U.S. Environmental Protection Agency  
Region IX (T-4-1)  
215 Fremont Street  
San Francisco, CA 94105

Under Section 3008 of RCRA, U.S.C. 6928, failure to comply with this request may result in an Order requiring compliance or a civil action for appropriate relief, including penalties. Failure to comply with this request under Section 104 of CERCLA may also result in a civil enforcement action against you by EPA. In addition, Section 3008(d) of RCRA imposes criminal penalties against any person who knowingly makes any false statement or misrepresents in responding to a request for information issued under Section 3007 of RCRA.

EPA regulations governing confidentiality of business information are set forth in Part 2, Subpart B of Title 40 of the Code of Federal Regulations. For any portion of the information submitted which you believe is entitled to confidential treatment, a

confidentiality claim may be asserted in accordance with 40 C.F.R., Section 2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 C.F.R., Section 2.203, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with response to this letter as a waiver of that claim, and the information may then be made available to the public by EPA without further notice.

Please include in your response to this request a notarized affidavit from a responsible company official stating that a diligent record search has been completed and that there has been a diligent interview of present and former employees who may have knowledge of operations, chemical use and storage, and business practices. Also include in the affidavit a statement that all information responsive to this request has been forwarded to the Agency.

Please give this matter your immediate attention. If you have any questions concerning this letter, please contact Alisa Greene at (415)974-8159 or Patti Cleary at (415)974-8015.

Sincerely,



Jeff Zelikson  
Director

Toxics and Waste Management Division

cc: Jon Wactor, ORC-EPA

IDENTICAL LETTERS SENT TO:

<u>Landfill Location</u>	<u>Addressee</u>
1. Brand Park Landfill 1601 W. Mountain St. Glendale CA 91207	George Miller Public Works Dept City of Glendale 541 W. Chevy Chase Dr. Glendale, CA 91204-1813
2. Penrose Pit No. 7 and No.8 8251 Tujunga Ave. Sun Valley, CA 91352	C.D. Van Gordon President L.A. by-Products Co. 1810 E. 25th St. Los Angeles, CA 90058
3. Toyon Canyon 5050 Mt. Hollywood Drive Los Angeles, CA 90028	Bob Alpern Bureau of Sanitation Waste Management Div. 200 n. Main St. City Hall East, Rm 1420 Los Angeles, CA 90012

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RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	
C.D. Van Gordon	
Street and No	
1810 E. 25th St.	
P.O., State and ZIP Code	
Los Angeles, CA 90058	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985